## Case3:07-md-01827-SI Document4397 Filed12/19/11 Page1 of 4 1 Jeffrey H. Howard (pro hac vice) Jerome A. Murphy (pro hac vice) 2 CROWELL & MORING LLP 1001 Pennsylvania Avenue, N.W. 3 Washington, D.C. 20004 Telephone: 202-624-2500 Facsimile: 202-628-5116 4 Email: jhoward@crowell.com 5 imurphy@crowell.com 6 Jason C. Murray (CA Bar No. 169806) Joshua C. Stokes (CA Bar No. 220214) 7 CROWELL & MORING LLP 515 South Flower St., 40th Floor 8 Los Angeles, CA 90071 Telephone: 213-622-4750 9 Facsimile: 213-622-2690 Email: jmurray@crowell.com 10 istokes@crowell.com Counsel for Plaintiff Motorola Mobility, Inc, 11 AT&T Mobility LLC, et al., Target Corp, et al. 12 [Additional counsel listed on signature page] 13 UNITED STATES DISTRICT COURT 14 NORTHERN DISTRICT OF CALIFORNIA 15 SAN FRANCISCO DIVISION 16 17 In re TFT-LCD (FLAT PANEL) ANTITRUST Master Docket No. 07-m-1827 SI LITIGATION 18 19 This Document Relates To: STIPULATION AND [PROPOSED] ORDER EXTENDING PLAINTIFFS' TIME TO MOVE TO COMPEL AS 20 Motorola Mobility, Inc. v. AU Optronics Corporation, et al., C 09-5840 SI TO CERTAIN DISCOVERY 21 AT&T Mobility LLC, et al. v. AU Optronics Corp., et al., C 09-4997 SI 22 Target Corp., et al. v. AU Optronics Corp., et 23 al., Case No. CV-04945 SI 24 25 26 27

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| 1  | Defendants Samsung SDI Co., Ltd. and Samsung SDI America, Inc. ("SDI") and   |  |  |
|----|--|--|--|
| 2  | Plaintiffs Motorola Mobility, Inc. ("Motorola"); AT&T Mobility, LLC, AT&T Corp., AT&T  |  |  |
| 3  | Services, Inc., Pacific Bell Telephone Company, AT&T Operations, Inc., AT&T DataComm,  |  |  |
| 4  | Inc., Southwestern Bell Co., ("AT&T") <sup>1</sup> ; Target Corp.; Sears Roebuck and Co.; Kmart Corp.; Ole   |  |  |
| 5  | Comp Inc.; Good Guys, Inc.; RadioShack Corp.; Newegg Inc. (collectively, "Plaintiffs"),  |  |  |
| 6  | stipulate as follows:  |  |  |
| 7  | WHEREAS Plaintiffs served a Joint Set of Interrogatories and a Joint Set of Requests for   |  |  |
| 8  | Production of Documents on SDI and certain other defendants on November 2, 2011 (the   |  |  |
| 9  | "Discovery");  |  |  |
| 10 | WHEREAS SDI provided Responses and Objections to the Discovery on December 5,  |  |  |
| 11 | 2011;  |  |  |
| 12 | WHEREAS the parties have begun to meet and confer regarding SDI's Responses and  |  |  |
| 13 | Objections to the Discovery, and require additional time to complete the meet and confer process;  |  |  |
| 14 | WHEREAS SDI may wish to supplement its Responses and Objections to Interrogatories   |  |  |
| 15 | 13, 15, 17, 19, 21 and 23-25 upon completing the meet and confer process;  |  |  |
| 16 | WHEREAS the current deadline to file motions to compel in the above-captioned cases is   |  |  |
| 17 | December 15, 2011, and SDI has agreed to permit Plaintiffs additional time to move to compel   |  |  |
| 18 | further responses to the Discovery;  |  |  |
| 19 | THEREFORE, SDI and Plaintiffs, by their respective undersigned counsel, stipulate and  |  |  |
| 20 | agree as follows:  |  |  |
| 21 | The deadline for Plaintiffs to move to compel further response to Interrogatories 13, 15,  |  |  |
| 22 | 17, 19, 21 and 23-25 in the Discovery shall be extended to January 31, 2012.   |  |  |
| 23 |  |  |  |
| 24 |  |  |  |
| 25 |  |  |  |
| 26 |  |  |  |
| 27 | <sup>1</sup> This stipulation is without prejudice to the Administrative Motion To Modify AT&T's Trial Schedule filed on December 8, 2011, or to Defendants' opposition thereto. |  |  |
| 28 |  |  |  |

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| 1                          | Dated: December 15, 2011  |
|----------------------------|---|
| 2                          | /s/ Joshua C. Stokes  |
| 3                          |   |
| 4                          | Jason C. Murray (CA Bar No. 169806)<br>Joshua C. Stokes (CA Bar No. 220214)<br>CROWELL & MORING LLP |
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| 8                          | ·   |
| 9                          | Jeffrey H. Howard ( <i>pro hac vice</i> ) Jerome A. Murphy ( <i>pro hac vice</i> )                  |
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| 14                         | Kenneth L. Adams (pro hac vice)<br>R. Bruce Holcomb (pro hac vice)                                  |
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| 19                         | leonardo@adamsholcomb.com   |
| 20                         | Counsel for Plaintiff Motorola Mobility, Inc., AT&T   |
| 21                         | Mobility, LLC, AT&T Corp., AT&T Services, Inc.,<br>BellSouth Telecommunications, Inc., Pacific Bell |
| 22                         | Telephone Company, AT&T Operations, Inc., AT&T DataComm, Inc., and Southwestern Bell Telephone      |
| 23                         | Company, Target Corporation; Sears, Roebuck and Co.; Kmart Corporation; Old Comp Inc.; Good Guys,   |
| 24                         | Inc.; RadioShack Corporation; and Newegg Inc.   |
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| 1  |                     | /s/ Michael W. Scarborough   |
|----|---------------------|--|
| 2  |                     | Michael W. Scarborough (SBN 203524)                                      |
| 3  |                     | Tyler Mark Cunningham (SBN 243694)                                       |
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| 8  |                     | Counsel for Defendants Samsung SDI America, Incand Samsung SDI Co., Ltd. |
| 9  |                     | ana samsung sD1 Co., Lia.  |
| 10 | IT IS SO ORDERED.   |  |
| 11 | II IS SO ORDERED.   |  |
| 12 | Dated:12/16/, 201   | 1 _  |
| 13 |                     | Suran Selaton  |
| 14 |                     | Mun Decurr   |
| 15 |                     | Hon. Susan Illston, United States District Judge                         |
| 16 | DCACTIVE-16957202.1 |  |
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